

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Case No. 12-12020 (MG)
Chapter 11
Jointly Administered

**DECLARATION OF GARVAN F. MCDANIEL ON BEHALF OF THE LAW FIRM
OF HOGAN McDANIEL, PLAINTIFFS' SPECIAL BANKRUPTCY COUNSEL,
IN SUPPORT OF CLASS COUNSEL'S MOTION FOR AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES**

I, GARVAN F. MCDANIEL, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Hogan McDaniel, Plaintiffs' Special Bankruptcy Counsel. I submit this declaration in support of my firm's application for an award of attorneys' fees in connection with services rendered in connection with the representation of Plaintiffs in the above-captioned proceeding, as well as the reimbursement of expenses incurred by my firm in connection therewith.

2. My firm is experienced in protecting creditors' interests in bankruptcy proceedings. My firm's attorneys and staff have significant bankruptcy experience and are well trained in all aspects of bankruptcy law. Plaintiffs' Counsel associated with us in this matter to assist them with understanding the relevant issues and developing and executing strategies on behalf of Plaintiffs and the Class relating to the bankruptcy.

3. The very substantial contribution of my firm is described in the accompanying Declaration of Mark A. Strauss in Support of Final Approval of Proposed *Rothstein* Class Action Settlement (Claim Nos. 4074 and 3966), Plan of Allocation, Award of Attorneys' Fees,

Reimbursement of Litigation Expenses, and Incentive Awards for Named Plaintiffs (the “Supporting Declaration”).

4. The schedule attached hereto as Exhibit 1 contains a detailed summary indicating the amounts of time spent by each attorney of my firm who was involved in this matter. The summary also indicates the lodestar calculation based on my firm’s current billing rates. For attorneys who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such attorneys in his or her final year of employment by my firm. The summary was prepared from contemporaneous daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

5. The total number of hours expended by my firm in this matter through March 21, 2014 is 311.50. The total lodestar for my firm is \$125,277.00, consisting of \$125,277.00 for attorneys’ time. No time was billed for professional support staff.

6. My firm’s lodestar figures are based upon the firm’s current billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm’s billing rates.

7. As detailed in Exhibit 2, my firm has incurred a total of \$1,283.65 in unreimbursed expenses in connection with this matter. These expenses are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred.

8. With respect to the standing of my firm, attached hereto as Exhibit 3 is a brief biography of my firm and the attorneys of my firm who were principally involved in this matter.

I declare under penalty of perjury, under the laws of the State of Delaware that the foregoing is true and correct.

Executed: April 26, 2016
Wilmington, Delaware

/s/ Garvan F. McDaniel
Garvan F. McDaniel

EXHIBIT 1

HOGAN MCDANIEL
GMAC MTG LODESTAR
FROM INCEPTION THROUGH MARCH 21, 2014

Attorney	Hours	Rate	Total
Garvin McDaniel	191.20	\$ 435	\$ 83,172.00
Meg Augustine	<u>120.30</u>	\$ 350	<u>42,105.00</u>
TOTAL LODESTAR	311.50		\$ 125,277.00

EXHIBIT 2

HOGAN MCDANIEL
GMAC MTG EXPENSES
FROM INCEPTION THROUGH FEBRUARY 29, 2016

Description	Amount
Travel	\$ 505.78
Filing Fees	200.00
Court Call Fees	195.00
Document Retrieval	130.50
Fedex	122.20
LexisNexis	52.16
Copies	46.40
Postage	<u>31.61</u>
TOTAL EXPENSES	\$ 1,283.65

EXHIBIT 3



HOGAN♦MCDANIEL
ATTORNEYS AT LAW

1311 Delaware Avenue
Wilmington, Delaware 19806

Garvan F. McDaniel, Esquire
Telephone (302) 656-7540, Ext. 12
Facsimile (302) 656-7599
Email: gmcdaniel@dkhogan.com

EMPLOYMENT

- **The Hogan Firm**, Wilmington, DE, 6/1/2014 to 12/31/14, Member
- **Hogan♦McDaniel** 1/1/2015 to present, Partner
- **Bifferato Gentilotti**, Wilmington, DE, 4/2004 to 5/2014 – Member
- **Welch & Associates**, Wilmington, DE, 5/2002 to 3/2004 – Attorney
- **Doroshow, Pasquale, Krawitz, Siegel & Bhaya**, Wilmington, DE, 11/2001 to 5/2002, Attorney
01/2000 to 11/2001 Law Clerk
- **The Honorable Charles C. Keeler**, Delaware County, PA, Summer 1999, Law Clerk

EDUCATION

- **Widener University School of Law**, Wilmington, Delaware, J.D. 2001
- **Saint Joseph's University**, Philadelphia, Pennsylvania, B.A., 1997

AREA OF PRACTICE

- Bankruptcy Litigation in the United States Bankruptcy Court for the District of Delaware. Represent Creditors Committees, secured lenders, and unsecured creditors.
- Creditor's Rights in Bankruptcy Court and State Court. Representing not only the rights of creditors against the debtor, but also the rights of creditors against one another.
- Real Estate Transactions and Litigation – residential and commercial closings and real estate related litigation.
- Commercial Litigation representing large financial institutions and other corporations throughout the state of Delaware. Represent largest bank in Delaware in commercial and consumer collection actions including foreclosures, replevins, note actions and asset sales.

ADMISSIONS

United States Court of Appeals for the Third Circuit, 2004
United States District Court for the District of Delaware, 2002
United States District Court for the District of New Jersey, 2002
Delaware, 2001
New Jersey, 2001

ASSOCIATIONS

New Jersey State Bar Association, 2001
Delaware State Bar Association, 2001
Delaware Trial Lawyers Association

REFERENCES AND REPRESENTATIVE CLIENTS AVAILABLE UPON REQUEST

Garvan F. McDaniel

Email: gmcDaniel@dkhogan.com



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Garvan McDaniel regularly counsels corporate clients in the areas of creditors' rights, collections, and practice and procedure in the United States Bankruptcy Court for the District of Delaware. He also works in the area of commercial litigation and is proud to regularly represent Wilmington Savings Fund Society, Delaware's oldest and largest bank in commercial collection actions throughout the State of Delaware.

Garvan represents debtors, trustees, unsecured creditors committees, lenders, landlords, preference defendants and trade creditors seeking to protect their rights under Chapters 7, 11 and 13 of the Bankruptcy Code. Garvan also handles commercial and residential real estate transactions and litigation.

He has extensive experience in representing Trustees and Debtors in litigating causes of action under Section 547 of the Code, resulting in substantial recoveries for estates.

He regularly serves as Delaware Counsel for Unsecured Creditor Committees and Ad Hoc Committees through his relationships with some of the nations leading and largest law firms in such cases as Energy Future Holdings, Ambassador International, North American Petroleum, Ritz and Hayes Lemmerz.

Areas of Practice:

Bankruptcy, Creditor's Rights, Commercial Litigation, Commercial and Residential Real Estate Transactions and Litigation

Education:

Widener University School of Law, J.D. 2001

Saint Joseph's University, B.A. International Relations and Political Science, 1997

Bar Admissions:

United States Court of Appeals for the Third Circuit, 2004

United States District Court for the District of Delaware, 2002

Delaware, 2001

New Jersey, 2001

4/26/2016

Delaware Commercial Litigation/Creditor Bankruptcy Lawyers | HoganMcDaniel

Pg 12 of 12

Professional Association and Memberships:

Member of the Delaware Trial Lawyers Association

Member of the Delaware Bar Association

Member of the American Bar Association